

FISHER & PHILLIPS LLP
 3800 Howard Hughes Parkway, Suite 950
 Las Vegas, Nevada 89169

FISHER & PHILLIPS LLP
 MARK J. RICCIARDI, ESQ.
 Nevada Bar No. 3141
 WHITNEY J. SELERT, ESQ.
 Nevada Bar No. 5492
 ANTHONY B. GOLDEN, ESQ.
 Nevada Bar No. 9563
 3800 Howard Hughes Parkway
 Suite 950
 Las Vegas, NV 89169
 Telephone: (702) 252-3131
 Facsimile: (702) 252-7411
 E-Mail Address: agolden@laborlawyers.com
*Attorneys for Defendants Southern Nevada Health District,
 Angus MacEachern, Lawrence Sands, Kim DiPasquale,
 Robert Gunnoe*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

VALERIE HIRATA; WHITNIE
 TAYLOR; and ANGELA JONES,

 Plaintiffs,

vs.

SOUTHERN NEVADA HEALTH
 DISTRICT, a political subdivision of Clark
 County, Nevada; GLENN SAVAGE, in
 both his individual and official capacity;
 ROSE HENDERSON, in both her
 individual and official capacity; AMY
 IRANI, in both her individual and official
 capacity; SUSAN LABAY, in both her
 individual and official capacity;
 JACQUELYN RAICHE-CURL, in both
 her individual and official capacity;
 LORRAINE FORSTON, in both her
 individual and official capacity; ANGUS
 MACEACHERN, in both his individual
 and official capacity; ROBERT GUNNOE,
 in both his individual and official capacity;
 KIM DIPASQUALE, in both her
 individual and official capacity; ROBERT
 NEWTON, in both his individual and
 official capacity; CARA EVANGELISTA,
 in both her individual and official capacity;

Case No. 2:13-CV-02302-LDG-VCF

**STIPULATION AND ORDER TO
 EXTEND TIME TO COMPLETE
 DISCOVERY PURSUANT TO LR
 26-4 (FOURTH REQUEST)**

1 LAWRENCE SANDS, in both his)
 2 individual and official capacity,)
 3 Defendants.)
 4 _____)

5 Pursuant to LR 26-4, the parties, by and through their respective counsel of record,
 6 for good cause, hereby stipulate to extend the discovery deadlines in the above-entitled
 7 matter by ninety (90) days up to including October 5, 2015 (the 90th day, October 4, 2015,
 8 falls on a Sunday). The parties further state the following:

9 **1. Statement specifying discovery completed:**

<u>DOCUMENT</u>	<u>DATE</u>	<u>PARTY</u>
Notice of LR 26-1 Conference	02/26/14	PSL
Plaintiffs' Initial Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	02/28/14	PSL
Plaintiffs' First Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/07/14	PSL
Plaintiffs' Second Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/14/14	PSL
Defendants' Fed. R. Civ. P. 26(f) Production	03/14/14	Olson/Cannon
Plaintiffs' Third Supplement to re-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/21/14	PSL
Plaintiffs' Fourth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/25/14	PSL
Plaintiffs' Fifth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	03/28/14	PSL
Plaintiffs' Sixth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	04/04/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendant Southern Nevada Health District	04/04/14	PSL
Plaintiffs' First Set of Request for Production of Documents to Defendants angus MacEachern, Lawrence Sands, Kim DiPasquale and Robert Gunnoe	04/08/14	PSL

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1	Plaintiffs' First Set of Request for Production of	04/08/14	PSL
2	Documents to Defendants Glenn Savage, Rose		
3	Henderson, Amy Irani, Susan LaBay, Jacque Raiche-		
4	Curl, Lorraine Forston, Robert Newton and Cara		
	Evangelista		
5	Defendants Southern Nevada Health District, Angus	04/10/14	Golden
6	MacEachern, Lawrence Sands, Kim DiPasquale, and		
	Robert Gunnoe's Initial Disclosures		
7	Plaintiffs' Seventh Supplement to Pre-Trial Disclosures	04/11/14	PSL
8	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
9	Plaintiffs' Eighth Supplement to Pre-Trial Disclosures	04/18/14	PSL
	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
10	Plaintiffs' Ninth Supplement to Pre-Trial Disclosures	04/18/14	PSL
	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
11	Certificate of Service	05/01/14	PSL
12	Plaintiffs' Tenth Supplement to Pre-Trial Disclosures	05/05/14	PSL
13	Made Pursuant to LR 26-1 and FRCP 26(a)(1)		
14	Defendants' Responses to First Set of Request for	05/12/14	Olson/Cannon
15	Production of Documents to defendants Glenn Savage,		
16	Rose Henderson, Amy Irani, Susan LaBay, Jacque		
	Raiche-Curl, Lorrain Forston, Robert Newton, an Cara		
	Evangelista		
17	Plaintiffs' Notice of Issuance of Subpoena for	05/15/14	PSL
18	Production of Documents		
19	Plaintiff's Eleventh Supplement to Pre-Trial	05/16/14	PSL
20	Disclosures Made Pursuant to LR 26-1 and FRCP		
	26(a)(1)		
21	Affidavit of Service	05/22/14	PSL
22	Defendant Southern Nevada Health District's	05/27/14	Golden
23	Responses to Plaintiffs' First Set of Request for		
	Production of Documents		
24	Defendants Angus MacEachern, Lawrence Sands, Kim	05/27/14	Golden
25	DiPasquale, and Robert Gunnoe's Responses to		
26	Plaintiffs' First Set of Request for Production of		
	Documents		
27	Defendant Angus MacEachern's First Set of	05/30/14	Golden
	Interrogatories to Plaintiff Valerie Hirata		

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1	Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Golden
2			
3	Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Golden
4	Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Golden
5			
6	Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Golden
7	Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Golden
8			
9	Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Golden
10	Defendant Angus MacEachern's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Golden
11	Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Golden
12			
13	Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Golden
14	Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Whitnie Taylor	05/30/14	Golden
15			
16	Defendant Kim DiPasquale's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Golden
17	Defendant Lawrence Sands' First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Golden
18			
19	Defendant Robert Gunnoe's First Set of Interrogatories to Plaintiff Valerie Hirata	05/30/14	Golden
20	Defendant Southern Nevada Health District's First Set of Interrogatories to Plaintiff Angela Jones	05/30/14	Golden
21			
22	Plaintiffs' Twelfth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	06/09/14	PSL
23	Plaintiffs' Notice of Taking Videotaped Depositions (All Defendants)	06/18/14	PSL
24			
25	Defendants' Responses to First Set of Request for Production of Documents to Defendants Glenn Savage, Rose Henderson, Amy Irani, Susan LaBay, Jacque Raiche-Curl, Lorraine Forston, Robert Newton and Cara Evangelista (First Supplement)	06/23/14	Olson/Cannon
26			
27			
28			

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1	Plaintiffs' Responses to Southern Nevada Health District's Request for Production of Documents	07/07/14	PSL
2			
3	Plaintiffs' Thirteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/22/14	PSL
4			
5	Plaintiffs' Fourteenth Supplement to Pre-Trial Disclosures Made Pursuant to LR 26-1 and FRCP 26(a)(1)	07/30/14	PSL
6			
7	Plaintiff Valerie Hirata's Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
8			
9	Plaintiff Valerie Hirata's Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL
10			
11	Plaintiff Valerie Hirata's Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
12			
13	Plaintiff Valerie Hirata's Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
14			
15	Plaintiff Valerie Hirata's Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
16			
17	Plaintiff Angela Jones' Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
18			
19	Plaintiff Angela Jones' Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL
20			
21	Plaintiff Angela Jones' Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
22			
23	Plaintiff Angela Jones' Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL
24			
25	Plaintiff Angela Jones' Answers to Defendant Kim DiPasquale's First Set of Interrogatories	07/30/14	PSL
26			
27	Plaintiff Whitnie Taylor's Answers to Defendant Southern Nevada Health District's First Set of Interrogatories	07/30/14	PSL
28			
	Plaintiff Whitnie Taylor's Answers to Defendant Lawrence Sands' First Set of Interrogatories	07/30/14	PSL
	Plaintiff Whitnie Taylor's Answers to Defendant Angus MacEachern's First Set of Interrogatories	07/30/14	PSL
	Plaintiff Whitnie Taylor's Answers to Defendant Robert Gunnoe's First Set of Interrogatories	07/30/14	PSL

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1	Plaintiff Whitnie Taylor's Answers to Defendant Kim	07/30/14	PSL
2	DiPasquale's First Set of Interrogatories		
3	Defendant Southern Nevada Health District's Second	08/06/14	Golden
4	Set of Interrogatories to Plaintiffs		
5	Defendant Southern Nevada Health District's Second	08/06/14	Golden
6	Requests for Production of Documents to Plaintiffs		
7	Plaintiffs' Fifteenth Supplement to Pre-Trial	09/03/14	PSL
8	Disclosures Made Pursuant to LR 26-1 and FRCP		
9	26(a)(1)		
10	Defendants': G. Savage, R. Henderson, A. Irani, S.	09/09/14	Olson/Cannon
11	LaBay, J. Raiche-Curl, L. Forston R. Newton and C.		
12	Evangelista Initial Disclosures (Second Supplement)		
13	Plaintiffs' Sixteenth Supplement to Pre-Trial	09/09/14	PSL
14	Disclosures Made Pursuant to LR 26-1 and FRCP		
15	26(a)(1)		
16	Plaintiffs' Answers to Southern Nevada Health	09/15/14	PSL
17	District's Second Set of Interrogatories		
18	Plaintiffs' Responses to Southern Nevada Health	09/15/14	PSL
19	District's Second Request for Production of Documents		
20	Plaintiffs' Seventeenth Supplement to Pre-Trial	09/15/14	PSL
21	Disclosures Made Pursuant to LR 26-1 and FRCP		
22	26(a)(1)		
23	Plaintiffs' First Supplemental Responses to Southern	09/15/14	PSL
24	Nevada Health District's First Request for Production		
25	of Documents		
26	Defendants': G. Savage, R. Henderson, A. Irani, S.	09/18/14	Olson/Cannon
27	LaBay, J. Raiche-Curl, L. Forston R. Newton and C.		
28	Evangelista Initial Disclosures (Third Supplement)		
	First Supplement to Defendants Southern Nevada	09/23/14	Golden
	Health Districts, Angus MacEachern, Lawrence Sands,		
	Kim DiPasquale, and Robert Gunnoe's Initial		
	Disclosures		
	Plaintiffs' Third Set of Request for Production of	10/07/14	PSL
	Documents to Defendant Southern Nevada Health		
	District		
	Plaintiffs' Eighteenth Supplement to Pre-Trial	10/17/14	PSL
	Disclosures Made Pursuant to LR 26-1 and FRCP		
	26(a)(1)		

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1	Defendants': G. Savage, R. Henderson, A. Irani, S.	11/10/14	Olson/Cannon
2	LaBay, J. Raiche-Curl, L. Forston R. Newton and C.		
3	Evangelista Initial Disclosures (Fourth Supplement)		
4	Plaintiffs' Nineteenth Supplement to Pre-Trial	11/12/14	PSL
5	Disclosures Made Pursuant to LR 26-1 and FRCP		
6	26(a)(1)		
7	Plaintiffs' First Set of Interrogatories to Defendant	12/12/14	PSL
8	Southern Nevada Health District		
9	Defendant Southern Nevada Health District's Third	12/24/14	Golden
10	Request for Production of Documents to Plaintiffs		
11	Defendant Southern Nevada Health District's Third Set	12/24/14	Golden
12	of Interrogatories to Plaintiff Valerie Hirata		
13	Defendant Southern Nevada Health District's Third Set	12/24/14	Golden
14	of Interrogatories to Plaintiff Angela Jones		
15	Defendant Southern Nevada Health District's Third Set	12/24/14	Golden
16	of Interrogatories to Plaintiff Whitnie Taylor		
17	Plaintiffs' Twentieth Supplement to Pre-Trial	01/06/15	PSL
18	Disclosures Made Pursuant to LR 26-1 and FRCP		
19	26(a)(1)		
20	Plaintiffs' Twenty-first Supplement to Pre-Trial	01/26/15	PSL
21	Disclosures Made Pursuant to LR 26-1 and FRCP		
22	26(a)(1)		
23	Plaintiff Whitnie Taylor's Answers to Defendant	01/21/15	PSL
24	Southern Nevada Health District's Third Set of		
25	Interrogatories		
26	Plaintiff Angela Jones' Answers to Defendant Southern	01/21/15	PSL
27	Nevada Health District's Third Set of Interrogatories		
28	Defendant Southern Nevada Health District's Answers	01/22/15	Golden
	to Plaintiffs' First Set of Interrogatories		
	Plaintiff Valerie Hirata's Answers to Defendant	01/25/15	PSL
	Southern Nevada Health District's Third Set of		
	Interrogatories		
	Plaintiffs' Responses to Defendant Southern Nevada	01/26/15	PSL
	Health District's Third Request for Production of		
	Documents to Plaintiffs		
	Glenn Savage's Request for Admissions to Valerie	03/03/15	Olson/Cannon
	Hirata		
	Glenn Savage's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon

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1	Defendants' Request for Production of Documents to Valerie Hirata	03/03/15	Olson/Cannon
2			
3	Amy Irani's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
4	Amy Irani's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
5	Susan LaBay's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
6	Susan LaBay's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
7	Jacquelyn Raiche-Curl's Request for Admissions to Valerie Hirata	03/03/15	Olson/Cannon
8			
9	Jacquelyn Raiche-Curl's Interrogatories to Valerie Hirata	03/03/15	Olson/Cannon
10	Glenn Savage's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
11	Glenn Savage's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
12			
13	Defendants' Request for Production of Documents to Whitnie Taylor	03/03/15	Olson/Cannon
14	Amy Irani's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
15	Amy Irani's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
16	Susan LaBay's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
17			
18	Susan LaBay's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
19	Jacquelyn Raiche-Curl's Request for Admissions to Whitnie Taylor	03/03/15	Olson/Cannon
20	Jacquelyn Raiche-Curl's Interrogatories to Whitnie Taylor	03/03/15	Olson/Cannon
21			
22	Glenn Savage's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
23	Glenn Savage's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
24	Defendants' Request for Production of Documents to Angela Jones	03/03/15	Olson/Cannon
25			
26	Amy Irani's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon
27	Amy Irani's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
28	Susan LaBay's Request for Admissions to Angela Jones	03/03/15	Olson/Cannon

1	Susan LaBay's Interrogatories to Angela Jones	03/03/15	Olson/Cannon
2	Jacquelyn Raiche-Curl's Request for Admissions to	03/03/15	Olson/Cannon
3	Angela Jones		
4	Jacquelyn Raiche-Curl's Interrogatories to Angela	03/03/15	Olson/Cannon
5	Jones		
6	Plaintiffs' Twenty-second Supplement to Pre-Trial	03/11/15	PSL
7	Disclosures Made Pursuant to LR 26-1 and FRCP		
8	26(a)(1)		

9 In addition to the foregoing, the depositions of Defendants Lorraine Forston,
10 Robert Gunnoe, Dr. Lawrence Sands, Robert Newton, Amy Irani, Susan LaBay-
11 Leverton, Rose Henderson, Jacquelyn Raiche-Curl have been conducted along with
12 former employee Steven Goode. (Mr. Goode's deposition will continue on April 20 and
13 21.) The depositions of the other individual Defendants and the Plaintiffs are in the
14 process of being scheduled as well as disclosure and ultimately depositions of expert
15 witnesses.

16 **2. Specific description of discovery that needs to be completed:**

17 Plaintiffs and Defendants will retain and disclose expert witnesses, rebuttal expert
18 disclosures, depositions of Plaintiffs and remaining Defendants, deposition of the person(s)
19 most knowledgeable for Defendants, depositions of any remaining percipient witnesses; and
20 additional Interrogatories, Requests for Admission and Requests for Production to Plaintiff
21 and Defendant (as necessary).

22 **3. The reasons why discovery cannot be completed within the current**
23 **deadline:**

24 Due to the large number of depositions that must occur in this case and handling
25 scheduling conflicts among the parties and their counsel, including several of the
26 individual parties now living out of state, not all depositions will be able to be scheduled
27 within sufficient time to allow for preparation before the current close of discovery
28

1 deadline. Additionally, the parties have served on each other additional written discovery
 2 that will need to be responded-to and processed prior to some of the remaining depositions
 3 that will need to be completed. It will be beneficial to have completed the remaining
 4 depositions prior to disclosure of experts and prior to determining whether any third-party
 5 witness depositions will need to occur. Additionally, as of Plaintiffs' 22nd supplement to
 6 their initial disclosures, they have identified several hundred witnesses and have produced
 7 approximately 21,000 pages of documents. Completing depositions of the parties will be
 8 important to further narrow down those witnesses and documents.
 9

10 **4. Proposed schedule for completing discovery:**

<u>Scheduled Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Deadline	July 6, 2015	October 5, 2015
Initial Expert Disclosure Deadline	May 5, 2015	August 3, 2015
Rebuttal Expert Deadline	June 6, 2015	September 4, 2015
Qualified Immunity Discovery Deadline - Pursuant to Court's Order of May 6, 2014, Docket #54	Deadline Eliminated	N/A
Qualified Immunity Dispositive Motion Deadline - Pursuant to Court's Order of May 6, 2014, Docket #54	Deadline Eliminated	N/A
Interim Status Report	May 5, 2015	August 3, 2015
Dispositive Motion Deadline	August 4, 2015	November 2, 2015
Pre-Trial Order (unless dispositive motions are filed, in which case the deadline shall be 30 days after decision of the dispositive motions or further order of the Court)	September 2, 2015	December 1, 2015

Last Day to Submit Motion
and/or Stipulation to Extend
Discovery

June 13, 2014

September 11, 2015

Dated this 14th day of April, 2015.

PARKER SCHEER LAGOMARSINO

By: /s/ Andre M. Lagomarsino

Andre M. Lagomarsino, Esq.

9555 South Eastern Avenue, Suite 210

Las Vegas, Nevada 89123

Attorney for Plaintiffs

Dated this 14th day of April, 2015.

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

By: /s/ Peter Angulo

WALTER CANNON, ESQ.

PETER ANGULO, ESQ.

9950 West Cheyenne Avenue

Las Vegas, Nevada 89129

*Attorneys for Defendants Savage,
Henderson, Irani, LaBay, Raiche-Curl,
Forston, Newton*

Dated this 14th day of April, 2015.

FISHER & PHILLIPS LLP

By: /s/ Anthony Golden

MARK RICCIARDI, ESQ.

ANTHONY GOLDEN, ESQ.

3800 Howard Hughes Parkway, Suite 950

Las Vegas, Nevada 89169


Attorneys for Southern Nevada Health

District, MacEachern, Sands, Gunnoe and

DiPasquale

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: April 28, 2015

FISHER & PHILLIPS LLP
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